

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

FELISHATAY ALVARADO,
Plaintiff,

v.

CITY OF PHILADELPHIA, et al.,
Defendants.

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**Civil Action
No. 22-3763**

**DEFENDANTS' MOTION *IN LIMINE* TO PRECLUDE THE TESTIMONY AND
REPORT OF GLENN GARRELS**

Defendants City of Philadelphia; Police Officers Joshua Burkitt, Eric Clark, Jose Hamoy, Brian Murray, Patrick Saba, Edward Song; and Sgt. Kevin Mellody; and Lt. Demetrius Monk (collectively “the Defendants”), by and through undersigned counsel, respectfully moves this honorable Court, pursuant to Federal Rule of Civil Procedure 702, for the entry of an order striking any portion of Mr. Garrels’ testimony that (1) expresses a legal conclusion; (2) opines on the layout of Ms. Alvarado’s apartment building; (3) opines on cell phone tracking data; and (4) refers to Ms. Alvarado’s dog, Akuma. In support of this Motion, Defendants submit the attached Memorandum of Law, which is incorporation by reference in its entirety herein.

Date: August 29, 2024

Respectfully submitted,

/s/ Emily Hoff

EMILY HOFF, ESQUIRE

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/s/ Jonah Santiago-Pagán

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